

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Case No. 1:20-CR-143
v.)	
)	Honorable T.S. Ellis, III
ZACKARY ELLIS SANDERS,)	
)	
<i>Defendant.</i>)	
_____)	

**GOVERNMENT’S MOTION TO SEAL SUPPLEMENTAL BRIEF IN OPPOSITION TO
DEFENDANT’S MOTION TO COMPEL DISCOVERY**

The United States of America, by and through its undersigned counsel and pursuant to Local Criminal Rule 49(C) and 49(E), moves to file under seal an un-redacted copy of the government’s supplemental brief in opposition to the defendant’s motion to compel discovery and exhibits 1 and 2 that accompany the supplemental brief. A redacted copy of the supplemental brief has been filed on the public docket. Dkt. No. 53. The un-redacted copy along with the exhibits will be delivered to the clerk’s office with a copy of this motion and emailed to defense counsel. A proposed Order is attached for the consideration of the Court.

The government’s supplemental filing responds to arguments and information regarding the underlying investigation in this matter that are subject to a protective order. *See* Dkt. No. 28. Through the protective order, the parties have agreed that certain information related to the investigation contained within the defendant’s motion, the government’s opposition, and the parties supplemental filings should be filed under seal. This investigation is ongoing and sensitive, and the government believes that the details of this investigation are not widely known. Sealing is therefore necessary in order to safeguard this information.

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to the parties of record.

By: /s/
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